

EXHIBIT 4

1
2 UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF NEW YORK

4 CASE No. 20 CIV. 7311 (LAK) (JLC)

5 E. JEAN CARROLL,

6 Plaintiff,

7 -vs-

8 DONALD J. TRUMP,
9 in his personal capacity,

10 Defendant.
_____ /

11
12
13 = = =

14 CONFIDENTIAL

15 = = =
16

17 VIDEOTAPED DEPOSITION OF DONALD J. TRUMP

18 Wednesday, October 19, 2022
19 10:22 a.m. - 3:50 p.m.

20 The Mar-a-Lago Club
21 1100 South Ocean Boulevard
22 Palm Beach, Florida, Florida

23 Stenographically Reported By
24 Pamela J. Pelino, RPR, FPR, CLR
25 Notary Public, State of Florida
TSG REPORTING
JOB NO. 218342
- - -

1 D. J. TRUMP

2 A. Not that I know of. Not very much,
3 certainly.

4 Q. How many times?

5 A. I don't know. I think very little, very,
6 very little, considering.

7 A lot of very famous people get sued all
8 the time, and in many cases they're just fake suits.
9 But I think I've had very few that I know of.

10 Q. Let's see if we can cut through this.

11 Is it your testimony today, sir, that
12 every single woman who has accused you of sexual
13 improprieties, whether the number is 24 or a
14 different number, was lying about it?

15 MS. HABBA: Objection to form.

16 THE WITNESS: Yeah, they were lying. I
17 would say every single one of them would be
18 lying.

19 BY MS. KAPLAN:

20 Q. Are you familiar -- I'm sure you are --
21 with something that's often referred to as "the
22 Access Hollywood tape"?

23 A. Yes, I am.

24 MS. KAPLAN: Okay. Let's mark it and
25 play it as 35.

1 D. J. TRUMP

2 And I apologize. I'm hoping the
3 technology works better.

4 (DJT Exhibit 35 was marked for
5 identification.)

6 (Video played.)

7 BY MS. KAPLAN:

8 Q. That's you in that video, speaking?

9 A. Yes, correct.

10 Q. And am I correct that video was recorded
11 in January -- withdrawn.

12 Am I correct that that video was recorded
13 September of 2005?

14 A. I guess that would -- don't know the
15 date. But whatever date it was is fine with me.

16 Q. And am I correct that you were engaged to
17 your current wife sometime in 2004?

18 A. I don't know.

19 Q. Am I correct that you married your
20 current wife in January 2005?

21 A. I don't know relative to that tape, no.

22 Q. Well, relative to that tape, isn't it
23 true you were married to your current wife?

24 A. I don't know. I don't know when the tape
25 was done.

D. J. TRUMP

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Q. Did you pay for the furniture?

A. No, I didn't. I didn't buy her anything, actually.

Q. And you say -- and again, this has become very famous -- in this video, "I just start kissing them. It's like a magnet. Just kiss. I don't even wait. And when you're a star, they let you do it. You can do anything, grab them by the pussy. You can do anything."

That's what you said; correct?

A. Well, historically, that's true with stars.

Q. True with stars that they can grab women by the pussy?

A. Well, that's what -- if you look over the last million years, I guess that's been largely true. Not always, but largely true. Unfortunately or fortunately.

Q. And you consider yourself to be a star?

A. I think you can say that, yeah.

Q. And -- now, you said before, a couple of minutes ago, that this was just locker room talk?

A. It's locker room talk.

Q. And so does that mean that you didn't

1 D. J. TRUMP

2 there was nothing -- I think the Anderson Cooper is
3 very big. But I think in addition to that, there
4 were no complaints. There was nothing lodged. Your
5 client doesn't have any idea what time, when, what
6 year, what decade, I guess. I don't know if they
7 even know the decade. I think you have it boiled
8 down to two or three years now.

9 No, it's -- I think it's a whole big
10 scam. And I think you're doing this for the
11 Democrat party, okay, your friends over in the
12 Democrat party.

13 Q. I think we looked at this earlier. At
14 the end of your statement, the first statement you
15 made about E. Jean Carroll on June 21, which has
16 been marked as DJT 20, you say, "If anyone has
17 information that the Democratic party is working
18 with Ms. Carroll or New York Magazine, please notify
19 me as soon as possible."

20 Did anyone ever notify you --

21 A. Well, I'll let you know.

22 MS. HABBA: Objection.

23 MR. MADAIIO: Objection. That was already
24 asked.

25 THE WITNESS: You'll hear. We'll let you

1 D. J. TRUMP

2 that.

3 But I act appropriately with people. I
4 act appropriately with women.

5 And it's very interesting. I mean, I
6 know you're a friend of Cuomo. You're an operative.
7 And you're suing me on various other cases, also.
8 And let's see how it all works out.

9 MS. KAPLAN: We're going to take a quick
10 break and see if there's anything else. I'm
11 not sure there is.

12 MS. HABBA: Very quick.

13 THE WITNESS: Quick.

14 MS. HABBA: I'll just have a couple quick
15 follow-ups.

16 THE VIDEOGRAPHER: Off the record at
17 3:45. On the record.

18 (A brief recess was taken.)

19 MS. KAPLAN: According to my watch, it's
20 ten of four, and Ms. Habba and I have just
21 agreed that we are finished. We have no
22 further questions, and we are officially off
23 the record.

24 (Deposition concluded at 3:50 p.m.)

25 - - -